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UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re

DEBRA YOUREN,

Debtor.

DUSTIN C. YOUREN; and CHRISTINA W.
 LOVATO, Chapter 7 Trustee,

Plaintiff,

v.

DEBRA K. YOUREN; BUSTER ALLEY; and
 AMERICAN AGCREDIT, FLCA, a Federally
 Chartered Farm Credit System Institution,

Defendants.

Case No.: 22-50556-hlb
 (Chapter 7)

Adv. No.: 24-05014-hlb

**STIPULATION TO EXTEND DEADLINE
 TO FILE RESPONSE OR ANSWER TO
 FIRST AMENDED COMPLAINT**

(FIRST REQUEST)

Hrg Date: N/A

Hrg Time: N/A

Defendant American AgCredit, FLCA (“American AgCredit”) and Plaintiffs Dustin C. Youren and Christina W. Lovato, Chapter 7 Trustee (collectively “the parties”), hereby stipulate and agree to an extension of time for American AgCredit to answer or respond to the First Amended Complaint as follows:

1. On August 23, 2024, Plaintiff Youren filed a state court Complaint against Defendants. (Doc. 1-1).

2. On September 24, 2024, American AgCredit removed this action to Bankruptcy

1 Court. (Doc. 1).

2 3. On October 4, 2024, Plaintiffs filed an amended complaint and electronically
3 served American AgCredit with the same. (Doc. 14).

4 4. On October 7, 2024, this court issued a summons to all Defendants and provided
5 notice of a scheduling conference set for December 18, 2024 at 10:30 a.m. (Doc. 9).

6 5. The deadline for America AgCredit to respond to the First Amended Complaint is
7 November 7, 2024, 30-day after issuance of the summons. *Id.*

8 6. The parties have agreed to allow American AgCredit an open extension of time
9 within which to answer or otherwise respond to the First Amended Complaint. Plaintiffs may
10 terminate this open extension upon transmission of an email notification to American AgCredit.
11 American AgCredit will then have 7 days, after service of an email notification terminating the
12 open extension, to docket an answer or otherwise respond to the First Amended Complaint.

13 7. This first request for an extension of time to respond to the First Amended
14 Complaint is in the spirit of judicial efficiency. The parties do not wish to incur additional costs
15 and expenses associated with litigating this adversary proceeding as a potential resolution to the
16 claims is explored.

17 Dated: November 4, 2024

Dated:

18 KAEMPFER CROWELL

ROBISON, SHARP, SULLIVAN & BRUST

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